

This petition for rulemaking does not appear to either reduce the administrative burden nor have any features that would advance the state of the art as it applies to the Amateur Radio service. It would increase the complexity of the licensing process with the rebuilding of the question pools. This feature alone is not needed since the process already exists to allow anyone to submit questions for evaluation and inclusion into the question pools in an orderly manner. It also adds an extra burden in the requirement for a time requirement for the vanity callsign program. In light of the many shortcomings of this petition, I urge you to simply dismiss it in it's entirety. Thank you.